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April 18, 2011

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1 CERTIFIED BY THE SUPREME
COURT OF NEW JERSEY AS A
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2 OF COUNSEL
+ ADMITTED TO NY
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ROGER GUARDA
CLAIMS MGR.

Via ECF

The Honorable Michael A. Shipp, U.S.M.J.
The United States District Court for the District of NJ
Martin Luther King, Jr. Federal Building &
United States Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: *Reyes v. Keith Machinery Corp., et al.*
Civil Action No.: 2:09-CV-5309
Our File No.: 233266

Dear Judge Shipp:

We represent the plaintiff, Ramon Reyes in the above entitled matter and are in receipt of a motion for summary judgment filed by ECF on April 15, 2011 by J.H. Day. According to the fourth amended scheduling order as amended, plaintiff's opposition to that motion must be filed by April 25, 2011.

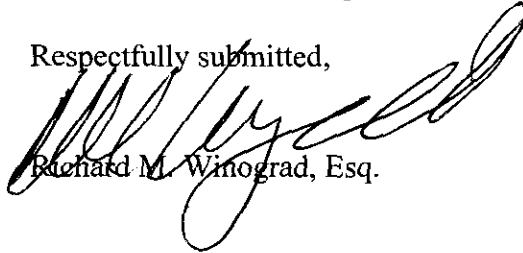
The schedule for the summary judgment motions was actually proposed by me in a letter dated March 28, 2011. At that time, I failed to take into account the intervention of the Passover and Easter holidays which occur during that period. It will be difficult if not impossible to file opposition by the current deadline of April 25, 2011. Accordingly, I am requesting an extension to the end of that week until Friday, April 29, 2011 for the opposition. In the interest of fairness, I will also ask that the due date for the reply papers be similarly extended by the same amount of days until Friday, May 6, 2011.

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I have obtained the consent of my adversaries for this application.

Thank you for the court's kind consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'R. Winograd', is written over the typed name.

Richard M. Winograd, Esq.

RMW/ecc

cc: Abigail Bowen, Esq. (Via ECF and Facsimile 212-952-1110)
J. Michael Kunsch, Esq. (Via ECF and Facsimile 215-557-0999)
Elizabeth Norton, Esq. (Via ECF & Facsimile 614-464-1737)